

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

MEZZ57TH LLC
d/b/a John Barrett,

Debtor.

Chapter 11

Case No. 20-11316

NOTICE OF APPEARANCE AND REQUEST FOR NOTICE

PLEASE TAKE NOTICE that Vedder Price P.C. (“Vedder Price”) hereby enters its appearance as counsel for Signature Bank (“Signature”), in the above-referenced bankruptcy case pursuant to Section 1109(b) of the Bankruptcy Code and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

PLEASE TAKE FURTHER NOTICE that Signature hereby appears in the above-captioned case by its counsel, Vedder Price, and such counsel hereby requests, pursuant to Rules 2002, 3017, 9007 and 9010 of the Bankruptcy Rules and Sections 102(1), 342 and 1109(b) of the Bankruptcy Code, that copies of all notices, pleadings given or filed in this case, be given and served upon it at the following address, telecopy, e-mail and telephone numbers:

Kevin J. Etzel, Esq.
Vedder Price P.C.
1633 Broadway, 31st Floor
New York, New York 10019
Telephone: (212) 407-7789
Facsimile: (212) 407-7799
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PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Code and the Bankruptcy Rules provisions specified above, but also includes, without limitation, all orders, notices, hearing dates, applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers, schedules of assets and liabilities and statements of affairs, operating reports, plan or plans of reorganization or liquidation, and disclosure statements, whether formal or informal, and whether transmitted or conveyed by mail, courier service, telegraph, telephone, e-mail, facsimile, telex, or otherwise, that affect the above-captioned debtors or the debtors' estates.

PLEASE TAKE FURTHER NOTICE that demand is also made that the above-referenced attorney be added to the Notice List for notice of all contested matters, adversary proceedings, and other proceedings in this chapter 11 case and/or any successor bankruptcy case.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any subsequent appearance, pleading, claim or suit is intended to waive and shall not constitute a waiver of (i) Signature's right to have final orders in non-core matters entered only after de novo review by a District Court; (ii) Signature's right to a jury trial in any proceedings so triable herein, or in any case, controversy, or proceeding related hereto; (iii) Signature's right to request to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which Signature is or may be entitled to under agreements, documents or instruments, in law or equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: June 9, 2020

Respectfully submitted,

VEDDER PRICE P.C.

By: /s/ Kevin J. Etzel

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